

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

KEILA RAVELO

Magistrate No. 14-6800-01

**CERTIFICATION OF AIDAN P.  
O'CONNOR IN SUPPORT OF  
MOTION TO WITHDRAW**

I, AIDAN P. O'CONNOR, Esq., hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am a member of Pashman Stein, P.C. I am co-counsel to Keila Ravelo in this case. I am fully familiar with the facts alleged herein. I make this certification support of my application to withdraw as counsel for Keila Ravelo in this matter.

2. On December 22, 2014, I entered an appearance in this matter (DE # 6).

3. On January 7, 2015, Lawrence Lustberg, Esq., of the firm Gibbons, P.C., entered an appearance in this matter (DE # 19). On January 9, 2015, Jake F. Goodman, Esq., of Gibbons, P.C., entered an appearance in this matter (DE # 26).

4. On January 8, 2015, Steven H. Sadow, Esq., moved for pro hac vice admission to this court to represent defendant Keila Ravelo (DE # 20). This court granted Mr. Sadow's admission pro hac vice by order dated January 9, 2015 (DE # 25).

5. Mr. Lustberg and Mr. Sadow are both experienced criminal defense lawyers.

6. Ms. Ravelo signed a retainer agreement with my firm on April 7, 2014. Ms. Ravelo has failed to live up to the terms of that agreement.

7. Furthermore, Ms. Ravelo has not communicated with me or responded to communications from me since March of this year.

8. This case has not yet been indicted and the withdrawal of Pashman Stein as co-counsel in this matter will not delay this action.

9. In the event that the Court requires me to expound upon these facts, I respectfully request that the Court permit me to provide such further details ex parte and in camera so as not to prejudice Ms. Ravelo.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**PASHMAN STEIN, P.C.**  
Co-counsel for Defendant Keila Ravelo

Dated: August 5, 2015

By: 

**AIDAN P. O'CONNOR**